

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

13 CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,

Plaintiffs,

V.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTIONS TO SEAL**

Re: Dkt. Nos. 614, 623, 655, 682, 695, 707, 732, 734, 797, 809, 815, 827, 833, 843, 848, 857, 892, 893

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

2 Google LLC submits this omnibus proposed order pursuant to the Court's Order Re: Pending
3 Administrative Motions for Leave to File Under Seal (Dkt. 902). Before the Court are various
4 pending motions to file under seal materials associated with Plaintiffs' Motion for Additional
5 Discovery Sanctions and Google's Motion to Deprecate ("Motions"). Dkts. 614, 623, 655, 682,
6 695, 707, 732, 734, 797, 809, 815, 827, 833, 843, 848, 857, 892, 893. Having considered the
7 Motions, supporting declarations, and other papers on file, and good cause having been found, the
8 Court **ORDERS** as follows:

Dkt. Nos. of Original Sealing Motion and Declaration / Statement in Support of Sealing submitted pursuant to Civ. L.R. 79-5(c) or 79-5(f)(3)	Description of Document Sought to be Sealed	Page and Line Numbers of Text Sought to be Sealed	Basis for Sealing
614 (Plaintiffs' Motion)	Plaintiffs' Administrative Motion Regarding Court's May 20, 2022 Order	GRANTED as to the portions at:	
623 (Google's Declaration ISO Sealing)	Dkts. 614-1, 623-2	Highlighted portions of pages 1:6, 2:4-5, 2:13, 3:8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of

1	2	3	4	5	6	such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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614 (Plaintiffs' Motion)	Exhibit A to the Declaration of Mark Mao (Supplemental Declaration of Martin Sramek in Response to May 20, 2022 Order)	Dkts. 614-2, 623-3	GRANTED as to the portions at: Highlighted portions of pages 2:14, 2:20, 2:24-28, 3:1, 3:3-10, 3:12-23, 3:27-28, 4:1-4, 6:1, 6:3-4, 6:6, 6:8-11, 6:13-27, 7:1, 7:3-9, 7:11-26, 8:1-13, 8:15-18	28	29	30
614 (Plaintiffs' Motion)	Exhibit B to the Declaration of Mark Mao (Declaration of Martin Sramek in Response to May 20, 2022 Order)		GRANTED as to the portions at: Highlighted portions of pages 1:23-26, 2:1-28, 3:1-16, 4:8	31	32	33

1	ISO Sealing)	Dkts. 614-3, 623-4		well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
14	655 (Plaintiffs' Motion) 682 (Google's Declaration ISO Sealing)	Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624 Dkts. 655-1, 682-2	GRANTED as to the portions at: Highlighted portions of pages 1:6, 1:17-23, 2:25, 3:1-2, 3:7, 3:12, 3:16-20, 3:23, 4:6, 4:17-18, 5:13-15, 5:24, 7:2-4, 8:6-9, 8:12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place

			Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion) 682 (Google's Declaration ISO Sealing)	Declaration of Christopher Thompson ISO Plaintiffs' Supplemental Sanctions Motion Dkts. 655-3, 682-3	GRANTED as to the portions at: Highlighted portions of pages 2:26, 3:19-20, 5:5-12, 5:19-20, 5:24, 5:26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion) 682 (Google's Declaration ISO Sealing)	Declaration of Mark C. Mao ISO Plaintiffs' Supplemental Sanctions Motion Dkts. 655-6, 682-4	GRANTED as to the portions at: Highlighted portions of pages 2:13-14, 2:17, 2:21	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business

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1	682 (Google's Declaration ISO Sealing)	Supplemental Sanctions Motion Dkts. 655-9, 682-6	Highlighted portions of pages 3:21-26, 6:20, 6:24-7:1, 8:5-7, 8:20-23, 9:21- 24, 10:2, 10:6-7	internal systems and operations, including various types of Google's logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
15	695 (Google's Motion)	Google LLC's Opposition to Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624 Dkt. 695-3	GRANTED as to the portions at: Highlighted portions of pages 1:13, 2:6, 2:18, 2:22-23, 2:26, 2:28, 3:1-6, 3:8- 9, 4:10, 4:14, 5:12, 8:7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their

1	2	3	4	systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
5	695 (Google's Motion)	7 Second Supplemental Declaration of Martin Sramek in Response to May 20, 2022 Order 8 Dkt. 695-4	9 GRANTED as to the portions at: 10 Highlighted portions of pages 1:10, 1:16-18, 2:18, 2:20-24, 2:26-3:3, 3:5-8	11 The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
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27	28	695 (Google's Motion)	Exhibit 1 to Trebicka Declaration Dkt. 695-5	GRANTED as to the portions at: Highlighted portions of PDF pages 2-3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such

			<p>confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	695 (Google's Motion)	Exhibit 2 to Trebicka Declaration Dkt. 695-6	<p>GRANTED as to the portions at: Highlighted portions of pages 140:11, 140:14-15, 140:18</p> <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>

1	695 (Google's Motion)	Exhibit 3 to Trebicka Declaration Dkt. 695-7	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18	695 (Google's Motion)	Exhibit 4 to Trebicka Declaration Dkt. 695-8	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1	2	3	4	5	6	7	Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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16	17	18	19	20	21	22	23
24	25	26	27	28	695 (Google's Motion)	Exhibit 5 to Trebicka Declaration Dkt. 695-9	GRANTED as to the portions at: Highlighted portions of pages 4:12, 4:18, 4:21, 5:14-15, 198:7, 198:18, 199:17, 201:4-5, 372:11, 372:15, 390:1-2, 390:15, 390:20 The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
24	25	26	27	28	695 (Google's Motion)	Exhibit 7 to Trebicka Declaration Dkt. 695-10	GRANTED as to the portions at: Highlighted portions of pages 94:15-24, 96:4, 97:24, 101:11, 101:15, 101:18 The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal

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707 (Plaintiffs' Motion)	Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief Pursuant to Dkt. 624 Dkts. 707-1, 732-2	GRANTED as to the portions at: Highlighted portions of pages 1:26, 2:6, 2:22, 2:24-25, 3:1-4, 3:9, 3:23-24, 4:23	may seek to use the information to compromise Google's internal practices relating to competing products.																								
732 (Google's Declaration ISO Sealing)	Exhibit B of Mao Declaration Dkts. 707-3, 732-3	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.																								

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28

1	2	3	also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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707 (Plaintiffs' Motion)	Exhibit D of Mao Declaration Dkts. 707-5, 732-5	GRANTED as to the portions at: Sealed Entirely	8 9 10 11 12 13 14 15 16 17 18 19 20 The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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734 (Google's Motion)	Exhibit 1 to Google's Sur-Reply to Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief Dkt. 734-3	GRANTED as to the portions at: Highlighted portions of pages 2:5-8, 3:4, 3:6, 3:8, 3:10-15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal databases, logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Google's Motion) Court's October 27, 2022 Order to Show Cause (Dkt. 784) Dkt. 797-3	Highlighted portions of pages i:8, i:11, i:13-19, 3:13, 3:23-24, 4:4, 4:17, 4:19, 4:22, 4:27, 5:3-5, 5:13-15, 5:20, 5:22-23, 5:25, 5:27, 6:1, 6:3, 6:5, 6:7, 6:9, 6:17-19, 6:27, 7:9-10, 7:12, 7:15-17, 7:21-23, 7:25-28, 8:1-3, 8:5-10, 8:12, 8:14-15, 8:18-26, 9:1-2, 9:4-9, 9:11-12, 9:14-16, 9:18-26, 10:1-12, 10:16-26, 10:28, 11:1-16, 11:18-20, 11:22-28, 12:1, 12:3-4, 12:6-16, 16:4-6, 16:21, 17:1-3, 17:28, 18:1-2, 18:8-9, 22:5-7, 22:10	and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18 19 20 21 22 23 24 25 26 27 28	797 (Google's Motion) Trebicka Exhibit 2 (6/17/21 Berntson Depo Trans. Excerpts) Dkt. 797-4	GRANTED as to the portions at: Highlighted portions of pages 4:12, 4:18, 4:21, 5:5-6, 198:7, 198:18, 199:17, 201:4-5, 372:11, 372:15, 375:9, 395:24, 396:14	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

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																				may seek to use the information to compromise Google's internal practices relating to competing products.																						
797 (Google's Motion)	Lee Exhibit B (GOOG-BRWN- 00858520) Dkt. 797-14	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.																																							
797 (Google's Motion)	Declaration of Xianzhi Liu Dkt. 797-15	GRANTED as to the portions at: Highlighted portions of pages 1:14, 1:19-28, 2:1-9, 2:11-12, 2:14-19, 2:23- 27, 3:1	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary																																							

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28

1	797 (Google's Motion)	Declaration of Eric Maki Dkt. 797-17	GRANTED as to the portions at: Highlighted portions of pages 1:15, 1:18, 1:20, 1:22-2:15, 2:17- 21, 2:26-28, 3:2- 4, 3:7, 3:9, 3:11, 3:13, 3:15-20, 3:22, 3:24-25, 4:1-2, 4:4, 4:6, 4:8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
19	797 (Google's Motion)	Maki Exhibit A (GOOG-BRWN- 00858548) Dkt. 797-18	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining

1	2	3	4	5	6	7	8	many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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18	19	20	21	22	23	24	25	26
27	28	797 (Google's Motion)	Declaration of Vasily Panferov Dkt. 797-19	GRANTED as to the portions at: Highlighted portions of pages 1:18, 1:20-24, 1:26-2:4, 2:7-25, 3:8-9, 3:11-13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.			
27	28	797 (Google's Motion)	Declaration of Martin Sramek	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding			

1	Dkt. 797-20	Highlighted portions of pages 1:21, 1:26-27, 2:2, 2:9	highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
17	797 (Google's Motion)	Declaration of Konstantinos Psounis Dkt. 797-21	GRANTED as to the portions at: Highlighted portions of pages 1-13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action.

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1	815 (Plaintiffs' Motion)	Exhibit 1 to Mao Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
15	815 (Plaintiffs' Motion)	Exhibit 2 to Mao Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and their proprietary functionalities that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to
16	827 (Google's Declaration ISO Sealing)	Dkts. 815-2, 827-3	Highlighted portions of pages 1-2	
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			compromise Google's internal practices relating to competing products.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14	815 (Plaintiffs' Motion) 827 (Google's Declaration ISO Sealing)	Exhibit 3 to Mao Declaration Dkts. 815-4, 827-5	GRANTED as to the portions at: Highlighted portions of pages 10:7-8, 149:21, 150:1, 150:12- 13, 151:8, 152:4- 5, 152:25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular internal project, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies and business practices, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
15 16 17 18 19 20 21 22 23 24 25 26 27 28	833 (Plaintiffs' Motion) 843 (Google's Declaration ISO Sealing)	Plaintiffs' Response to the Court's Order to Show Cause (Dkt. 784) Dkts. 833-1, 843-2	GRANTED as to the portions at: Highlighted portions of pages i:19, i:21, 1:9- 12, 1:15, 1:18, 2:19, 2:23, 2:25, 3:27, 4:22, 6:3, 6:19, 7:13, 7:18- 22, 8:11, 8:19, 8:22-23, 9:1, 9:12, 9:23-24, 9:26, 11:11, 11:22-23, 11:25-27, 12:2, 12:4-5, 12:8, 12:14-15, 12:22, 13:3-4, 13:13, 13:18, 13:20, 14:6-7, 14:10, 14:13, 14:17, 14:25, 16:1, 16:3, 16:8-9,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of internal projects, data fields and logs, and their proprietary functionalities, as well as internal metrics, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See Dkt. 81 at 2-3.</i> Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats,

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			may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)	Exhibit 6 to the Declaration of Mark Mao	GRANTED as to the portions at: Highlighted portions of pages 10:7–8, 13:12, 149:21, 150:1, 150:12–13, 151:8, 152: 4–5, 152:25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including an internal project, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information sought to be sealed also contains an individual's personally identifying information.
833 (Plaintiffs' Motion)	Exhibit 7 to the Declaration of Mark Mao	GRANTED as to the portions at: Highlighted portions of PDF pages 4–5	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such

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		18:25, 19:1-2, 21:1, 21:22, 22:21, 25:5, 25:17, 25:20, 25:23, 26:4, 26:8-10, 26:16- 17, 28:1	various types of Google's internal projects and internal databases, as well as internal metrics, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
848 (Google's Motion)	Exhibit 6 to Trebicka Declaration (Jan. 23, 2023 correspondence) Dkt. 848-9	GRANTED as to the portions at: Highlighted portions of pages 1, 3-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
857 (Google's Motion)			
857 (Google's Motion)	Google LLC's Reply in Support of Its Response to the Court's October 27.	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's

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857 (Google's Motion)	Spilly Declaration. Exhibit 1 (Email chain re: Google's Response to Order to Show Cause) Dkt. 857-5	GRANTED as to the portions at: Highlighted portions of pages 4–6, 11, 13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
857 (Google's Motion)	Spilly Declaration. Exhibit 2 (Email chain re: Brown v. Google – Source Code) Dkt. 857-6	GRANTED as to the portions at: Highlighted portions of pages 4–7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary	

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1	857 (Google's Motion)	Spilly Declaration. Exhibit 4 (GOOG-CABR-00058527) Dkt. 857-8	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and strategies, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18	857 (Google's Motion)	Spilly Declaration. Exhibit 5 (GOOG-CABR-04131930) Dkt. 859-9	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and strategies, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the

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1			cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.	
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3	857 (Google's Motion)	Spilly Declaration. Exhibit 10 (Plaintiffs' RFPs to Google, Set 6) Dkt. 857-13	GRANTED as to the portions at: Highlighted portions of pages 10:12, 10:15, 11:20, 11:22–23, 16:9	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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20	857 (Google's Motion)	Spilly Declaration. Exhibit 11 (Berntson Exhibit 13 - Berntson Fact Sheet) Dkt. 857-14	GRANTED as to the portions at: Highlighted portions of pages 3–12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal identifiers, internal data sources, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining
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1	2	3	4	5	6	7	8	many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
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18	19	20	21	22	23	24	25	857 (Google’s Motion) Declaration of Steven Ellis Dkt. 857-15 GRANTED as to the portions at: Highlighted portions of pages 2:3, 2:13, 3:1, 3:3, 3:6-9, 3:12–18, 3:22–23, 3:27, 4:1, 4:28 The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects, source code, and internal data sources, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
26	27	28	Exhibits A-D to Declaration of Steven Ellis Dkt. 857-16 GRANTED as to the portions at: Sealed Entirely The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations,					

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projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
UNITED STATES MAGISTRATE JUDGE